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THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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September 18, 2024

**VIA ECF**

Hon. John P. Cronan  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, New York 10007

Re: *L.B. v. New York City Dep't of Educ.*, 24-cv-2173 (JPC)(SLC)

Dear Judge Cronan:

I am a Special Assistant Corporation Counsel in the office of Acting Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 30-day extension of Defendant's time to respond to the Complaint, from September 23 to October 23, 2024. Plaintiff consents to this request. This is the second request for an extension, the first extension having been granted on June 3, 2024 (ECF 9). Defendant also respectfully requests that the joint status letter due September 23 be adjourned to October 23, 2024 as well. The parties have exchanged multiple offers and need additional time for further settlement discussions. We have resolved recent similar IDEA fees-only cases brought by plaintiffs represented by the Roller firm without the need to burden the court with any sort of motion practice, conferences or even the need to file an Answer. The parties are hopeful this matter will be resolved as well.

Accordingly, Defendant respectfully requests that Defendant's time to respond to the complaint be extended to October 23, 2024, with a next joint status letter due that same date either informing the Court that case has fully resolved or proposing a briefing schedule.

Thank you for considering these requests.

Respectfully submitted,

/s/ Marina Moraru

Marina Moraru, Esq.

Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)

The request is granted. Defendant's time to respond to the Complaint is extended to October 23, 2024. The parties are also directed to file a status letter in this matter on that date. The Clerk of Court is respectfully directed to close Docket Number 10.

SO ORDERED.

Date: September 19, 2024  
New York, New York

JOHN P. CRONAN  
United States District Judge